

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CASE NO. 1:23-CV-00020-MR-WCM

Clara M. Mann _____)

Plaintiff(s), _____)
v. _____)

Trails Carolina, LLC _____)

Defendant(s). _____)

AMENDED DISCLOSURE BY PARTY OR INTERVENOR
IN A DIVERSITY CASE

This disclosure must be filed on behalf of each party or intervenor to an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a). Counsel has a continuing duty to update this information. An executed form should be electronically filed. The disclosing party must file this disclosure at the time of the party's first appearance, pleading, petition, motion, response, or other request addressed to the Court. The disclosing party also must serve this form on the other parties to the action.

Trails Carolina, LLC _____ Defendant
(Name of Party) _____ who is _____
(Plaintiff / Defendant / Movant / Intervenor)

makes the following disclosures:

1. Is the party identified above an individual?

YES NO

If the answer is "YES," identify the State citizenship of that individual:

N/A

If the answer is "NO," proceed to question No. 2 below.

2. Identify the name and State citizenship of every individual or entity whose citizenship is attributable¹ to the party identified above:

s/ Kristy M. D'Ambrosio
Signature of Attorney

07/05/2023

Date

¹ “For purposes of diversity jurisdiction, the citizenship of a limited liability company . . . is determined by the citizenship of all of its members.” Cent. W. Va. Energy Co., Inc. v. Mountain State Carbon, LLC, 636 F.3d 101, 103 (4th Cir. 2011). When members are LLCs themselves, the citizenship issues must be traced through until one reaches only individuals and/or corporations. See Jennings v. HCR ManorCare, Inc., 901 F.Supp.2d 649, 651 (D.S.C. 2012) (“an LLC’s members’ citizenship must be traced through however many layers of members there may be”).

ADDENDUM TO DEFENDANT TRAILS CAROLINA, LLC'S
AMENDED CITIZENSHIP DISCLOSURE

1. Wilderness Training & Consulting, LLC is the sole member-manager of Defendant Trails Carolina, LLC. Wilderness Training & Consulting, LLC is a limited liability corporation organized and existing under the laws of the State of Oregon.

2. WTCSL, LLC is the sole member manager of Wilderness Training & Consulting, LLC. WTCSL, LLC is a limited liability corporation organized and existing under the laws of the State of Oregon.

3. WTCSL, LLC has the following member-managers: WTC Holdco, LLC, eight additional limited liability companies, and twenty individual members. WTC Holdco, LLC is a limited liability corporation organized and existing under the laws of the State of Oregon. The additional limited liability companies and individual member-managers are citizens of states other than South Carolina.

4. WTC Holdco, LLC has the following member-managers: four limited liability companies and one individual member. The four limited liability companies and individual member are citizens of states other than South Carolina.

5. Defendant Trails Carolina, LLC affirmatively represents to the Court that, in tracing the corporate and individual entities in levels below Trails Carolina, LLC, including without limitation those detailed herein, all are citizens of states other than South Carolina.

6. Plaintiff is a citizen of the State of South Carolina. Defendant acknowledges that there is complete diversity of citizenship between Plaintiff on the one hand and Defendant and the affiliated entities referenced herein.

7. Should the Court need additional supplementation of citizen disclosure, Defendant Trails Carolina, LLC would respectfully request the opportunity to be heard on the matter prior to further submissions.